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DATE FILED: 11/20/14

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November 20, 2014

Via Facsimilie

Hon. Edgardo Ramos, U.S.D.J. United States District Court For The Southern District of New York United States Courthouse 40 Foley Square, Courtroom 619 New York, NY 10007 The application is

__granted.

Edgardo Ramos, U.S.D.J.

Dated: 11/20/14

New York, New York 10007

Re:

Mbody Minimally Invasive Surgery, P.C. v. UnitedHealthCare Insurance Company, et al.

Civ. Act. No.:

14-cv-2495

Sedgwick File No.:

03246-000239

Dear Judge Ramos:

This office represents defendants in the above referenced action. We write to respectfully request an extension of time to file defendants' pre-motion conference letter regarding their motion to dismiss the amended complaint. The court ordered defendants to file the letter by November 24, 2014. We request an extension of time to December 8, 2014.

This extension would not affect any other previously scheduled dates. The reason for the extension of time is to allow the parties to enter into a stipulated protective order for the exchange of protected health information and to exchange that information. In this instance, plaintiffs redacted the Member Identification Nos. in Exhibits A & B to the Amended Complaint. This information is needed in order to evaluate the claims identified and analyze whether there are defenses specific to those claims that may be asserted on a motion to dismiss. Plaintiffs consent to the extension of time.

Thank you for your consideration of this matter.

Respectfully submitted,

Michael H. Bernstein Sedgwick LLP

cc: Plaintiffs' counsel (via email)